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TROUTMAN PEPPER HAMILTON SANDERS LLP
600 Peachtree St. NE #3000
Atlanta, GA 30308 (*Corporate Office*)
*Attorneys for Defendant Nationstar
Mortgage LLC, dba Mr. Cooper and Federal
National Mortgage Association*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SFR INVESTMENTS POOL 1, LLC,

Plaintiff,

vs.

NATIONSTAR MORTGAGE, LLC d/b/a
MR. COOPER; FEDERAL NATIONAL
MORTGAGE ASSOCIATION; DOES I
through X; and ROE BUSINESS ENTITIES
I through X, inclusive,

Defendants.

Case No. 2:22-cv-00534-GMN-NJK

**STIPULATION AND ORDER TO EXTEND
DEADLINES**

(SECOND REQUEST)

Plaintiff, SFR Investments Pool 1, LLC (“SFR”) and Defendants, Nationstar Mortgage, LLC d/b/a Mr. Cooper (“Nationstar”) and Federal National Mortgage Association (“Fannie Mae”) (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree to extend the date for Nationstar and Fannie Mae to file a response to SFR’s Complaint [ECF No. 1]. The Parties further stipulate and agree that the foreclosure sale on the subject property be postponed until this Court rules on SFR’s Emergency Motion for Temporary Restraining Order and Preliminary Injunction (“Motion”) [ECF No.’s 7, 8]. In support of the stipulation, the Parties state as follows:

1. On March 28, 2022, SFR Investments Pool 1, LLC (“SFR”) filed the Complaint in the instant matter. [ECF No 1].
2. On March 30, 2022, SFR filed an Emergency Motion for Temporary Restraining Order and Preliminary Injunction (“Motion”). [ECF No. 7, 8].
3. On April 1, 2022, this Court entered a minute order in chambers setting a deadline for Defendants to respond to the Motion no later than Monday, April 4, 2022 at 5:00 p.m. and further ordering an in person hearing on the Motion for Tuesday, April 5, 2022, at 3:00 p.m. [ECF No. 8].
4. On April 4, 2022, this Court entered an order extending the deadline for Defendants to respond to the motion for preliminary injunction to April 13, 2022 and setting the deadline for SFR to file a reply in support of its motion for April 20, 2022. [ECF No. 12].
5. On April 15, 2022, this Court entered an order extending the deadline for Defendants to respond to the motion for preliminary injunction and file a responsive pleading to SFR’s Complaint to May 4, 2022. The Order further allowed the Motion to be briefed in the normal course pursuant to LR 7-2. [ECF No. 14].
6. On June 7, 2022, this Court entered an order extending the deadline for Defendants to respond to the motion for preliminary injunction and file a responsive pleading to SFR’s Complaint to June 24, 2022. The Order further declared that SFR shall have seven days after service of Defendants’ Response to file a reply in support of its Motion. [ECF No. 16].
7. Defendants filed its Opposition to the Motion for Preliminary Injunction on June 24, 2022. [ECF No. 17].
8. On June 29, 2022, this Court entered an order extending the deadline for Defendants to file a responsive pleading to SFR’s Complaint to July 22, 2022. [ECF No. 19]
9. SFR to filed its Reply in Support of its Motion for Preliminary Injunction on July 7, 2022. [ECF No. 20].
10. Defendants agree to refrain from setting the foreclosure sale of the real property located at

1 **6171 Fox Creek, Las Vegas, NV 89122, Parcel No. 161-15-212-175** until such time as
 2 this Court rules on the Motion. The Motion is now fully briefed.

- 3 11. Finally, the Parties agree that Defendants shall have until August 19, 2022, to file a
 4 response to SFR's Complaint.
 5 12. Both parties represent this stipulation is not made with any intent to delay or prejudice
 6 either party.
 7

8 DATED this 25th day of July, 2022.

9 **TROUTMAN PEPPER HAMILTON SANDERS LLP**

10 /s/ Vanessa M. Turley

11 Vanessa M. Turley, Esq.
 12 Nevada Bar No. 14635
 13 8985 S. Eastern Avenue, Suite 200
 14 Las Vegas, NV 89123

15 *Counsel for Nationstar Mortgage, LLC
 16 dba Mr. Cooper and Federal National
 17 Mortgage Association*

8 DATED this 25th day of July, 2022.

9 **HANKS LAW GROUP**

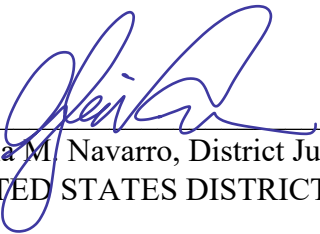
10 /s/ Chantel M. Schimming

11 Chantel M. Schimming, Esq.
 12 Nevada Bar No. 8886
 13 7625 Dean Martin Drive, Suite 110
 14 Las Vegas, NV 89139

15 *Counsel for SFR Investments Pool 1, LLC*

16
 17 **IT IS SO ORDERED.**
 18

19 Dated this 28 day of July, 2022.

20
 21 
 22 _____
 23 Gloria M. Navarro, District Judge
 24 UNITED STATES DISTRICT COURT
 25
 26
 27
 28

Duarte, Evelyn S.

From: Turley, Vanessa M.
Sent: Tuesday, July 26, 2022 3:18 PM
To: Duarte, Evelyn S.
Subject: FW: Pagua / 6171 Fox Creek -SAO to extend deadline to file Responsive Pleading to Complaint [Second Request]
Attachments: SAO to Extend Response Deadlines Pagua_ 6171 Fox Creek 2nd Request (SFR edits).docx

Vanessa M. Turley

Attorney

troutman pepper

Direct: 470.832.5572

vanessa.turley@troutman.com


From: Chantel Schimming <chantel@hanksllg.com>
Sent: Friday, July 22, 2022 5:50 PM
To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>; Karen Hanks <karen@hanksllg.com>
Cc: STAFF HANKSLG <staff@hanksllg.com>; Balser, Justin D. <Justin.Balser@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Pagua / 6171 Fox Creek -SAO to extend deadline to file Responsive Pleading to Complaint [Second Request]

EXTERNAL SENDER

See attached a redlined copy of the SAO. I made a few edits. I believe the MTRO/PI has been fully briefed and the SAO is just for an extension of the responsive pleading deadline, correct? Also, I added Fannie Mae as a party you represent and as a party in parts of the body where Fannie Mae was left out.

With these redlined changes, you can file with my e-signature.

Thanks,
Chantel



Chantel M. Schimming, Esq.
Associate Attorney

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From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>
Sent: Friday, July 22, 2022 2:14 PM
To: Karen Hanks <karen@hankslg.com>; Chantel Schimming <chantel@hankslg.com>
Cc: STAFF HANKSLG <staff@hankslg.com>; Balser, Justin D. <Justin.Balser@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Pagua / 6171 Fox Creek -SAO to extend deadline to file Responsive Pleading to Complaint [Second Request]

Hi Karen and Chantel,

Attached is the stipulation and order. Please let me know if I may submit with your e-signature.

Thanks and have a good weekend!

Vanessa M. Turley
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From: Karen Hanks <karen@hankslg.com>
Sent: Thursday, July 21, 2022 1:17 PM
To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>; Chantel Schimming <chantel@hankslg.com>
Cc: STAFF HANKSLG <staff@hankslg.com>; Balser, Justin D. <Justin.Balser@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Pagua / 6171 Fox Creek - Original Collateral File

EXTERNAL SENDER

I have not. Let's stipulate and I'll look at it this week or next.



Karen L. Hanks, Esq.
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From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>
Sent: Thursday, July 21, 2022 12:53 PM
To: Karen Hanks <karen@hankslg.com>; Chantel Schimming <chantel@hankslg.com>
Cc: STAFF HANKSLG <staff@hankslg.com>; Balser, Justin D. <Justin.Balser@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Pagua / 6171 Fox Creek - Original Collateral File

Hi Karen,

I was wondering if you were able to look into the below. If not, I can draft and Stip and Order to extend the responsive pleading date.

Thanks,

Vanessa M. Turley
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vanessa.turley@troutman.com

From: Karen Hanks <karen@hankslg.com>
Sent: Tuesday, July 19, 2022 9:31 AM
To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>; Chantel Schimming <chantel@hankslg.com>
Cc: STAFF HANKSLG <staff@hankslg.com>; Balser, Justin D. <Justin.Balser@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Pagua / 6171 Fox Creek - Original Collateral File

EXTERNAL SENDER

Let me look into it. Might not be until a little later today though. Either way, if need be we can extend the responsive pleading date again.



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From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>
Sent: Tuesday, July 19, 2022 8:48 AM
To: Karen Hanks <karen@hanksllg.com>; Chantel Schimming <chantel@hanksllg.com>
Cc: STAFF HANKSLG <staff@hanksllg.com>; Balser, Justin D. <Justin.Balser@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Paguia / 6171 Fox Creek - Original Collateral File

Hi Karen,

I just left you a voicemail on this file. Our responsive pleading is due July 22 and we are awaiting a hearing date for the Motion for Preliminary Injunction. The Complaint contains the note-based allegations we discussed over the phone last week.

Do you want to do a Stip and Order to file an Amended Complaint? Let me know or just send it over. Also, happy to discuss at 702-349-7748.

Thank you,

Vanessa M. Turley
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Direct: 470.832.5572
vanessa.turley@troutman.com

From: Karen Hanks <karen@hanksllg.com>
Sent: Monday, July 11, 2022 1:38 PM
To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>; Chantel Schimming <chantel@hanksllg.com>
Cc: STAFF HANKSLG <staff@hanksllg.com>; Balser, Justin D. <Justin.Balser@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Paguia / 6171 Fox Creek - Original Collateral File

EXTERNAL SENDER

Paige,

Not producing the note was just one of the violations of NRS 107.200 and 210. We did not plead a separate claim for failing to produce the note. Even if we had, complying after we file suit wouldn't be grounds to dismiss a claim. We still have the damages that flowed from the failure.

But thanks. I don't know that we need to inspect the original, but if we do, I'll contact McCarthy.



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From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>
Sent: Monday, July 11, 2022 12:32 PM
To: Chantel Schimming <chantel@hankslg.com>; Karen Hanks <karen@hankslg.com>
Cc: STAFF HANKSLG <staff@hankslg.com>; Balser, Justin D. <Justin.Balser@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: Pagua / 6171 Fox Creek - Original Collateral File

Hi Chantel & Karen,

We have been notified that the original collateral file for Pagua has been delivered locally to McCarthy Holthus.

I have attached the file for your review. However, if you would like to inspect the original Note at their office, you may make an appointment at McCarthy Holthus.

In light of the same, we would request that you dismiss the claims in the Complaint relating to the Note. We would also entertain any settlement offer your client wishes to provide.

Thank you,

Vanessa M. Turley

Attorney

Direct: 470.832.5572

vanessa.turley@troutman.com

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